

July 20, 2005

Mr. Paul Dabbs  
Statewide Planning Branch  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Re: Comments on the Public Review Draft of the California Water Plan Update of 2005

Dear Mr. Dabbs:

We appreciate the opportunity to comment on the Public Review Draft of the California Water Plan Update of 2005 prepared by your agency.

Now in its 40<sup>th</sup> year, Self-Help Enterprises has assisted scores of small poor rural communities in the San Joaquin Valley in applying for funds to develop safe drinking water and sanitary sewage disposal facilities. This experience has helped us understand first-hand the needs of small disadvantaged communities who find it challenging to obtain affordable financing for this necessary infrastructure.

This updated plan is very informative and thought provoking. Our only comment centers on the final recommendation in the report which is related to environmental justice:

Recommendation 14 – Ensure Environmental Justice across All Communities

The recommendation states in bold in the first paragraph that “disadvantaged communities and vulnerable populations”... should “get equal access to State funding for water projects”. However, the following Action Plan, Intended Outcomes, Performance Measures and so forth do not address this issue further. These communities and populations are encouraged to participate in water planning processes, which is important. But to actually accomplish improvement in their communities, funding is needed to provide safe and affordable drinking water and sanitary sewage disposal facilities.

More emphasis in the Recommendation should be placed on assuring that funding is made available to disadvantaged communities and then measuring the performance of the infusion of resources to these areas to assure that all have equal access to scant economic resources. These communities need a hand up to be on a level playing field when competing with more affluent jurisdictions. These more affluent areas have the resources to cover predevelopment costs to ably apply for funding and then have the ability to meet readiness to proceed requirements that smaller poorer communities lack.

Funding programs should make options available for disadvantaged communities (particularly severely disadvantaged communities) to provide predevelopment grants to cover preliminary engineering costs, environmental work and even design costs prior to construction funding. Depending on the applicability to the program, there should be a funding set aside for disadvantaged communities as well as meaningful bonus points in the ranking process based on the median household income or the percentage of persons in poverty in a community.

We ask that you take these suggestions into account in developing your final policy recommendations. Thank you for this opportunity to comment on this very important issue.

Sincerely,

Peter N. Carey  
President and CEO